

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA on behalf of himself :
and others similarly situated, :
: Plaintiff, : Case No. 1:19-cv-12235-LTS
: :
v. :
: QUOTEWIZARD.COM, LLC :
: Defendant. :
: :
_____ /

JOINT STATUS REPORT PER ECFs 292, 297 and 299

Pursuant to the Court’s June 28, 2022 Order [ECF No. 292], Plaintiff Joseph Mantha (“Mantha”) and Defendant QuoteWizard.com, LLC (“QuoteWizard”) (the “Parties”) file this Joint Status Report concerning the proposed schedule for the completion of class discovery, expert disclosures and rebuttal reports, expert discovery, and class certification motion briefing.

QuoteWizard made productions to Mantha on September 16, October 7, 11, and 17, and November 9 and 11, 2022. Drips Holdings, LLC (“Drips”) produced certain records to QuoteWizard on October 14, 2022, which QuoteWizard has provided to Mantha within the 14-day deadline under ECF No. 292. Counsel for QuoteWizard has advised that it intends to make a further production of records to Plaintiff by or before January 16, 2023. In addition, Counsel for Mantha is negotiating with Drips for an additional production of records.

With respect to QuoteWizard’s affirmative defense production (including consent) the Parties have agreed that all of QuoteWizard’s productions (both past and expected as outlined above) shall be deemed timely, and that QuoteWizard’s affirmative defense discovery production will be closed as of January 7, 2023. With the exception that when Drips produces additional

records, QuoteWizard shall have a month to review those records to confirm whether those records tie to any further consent records for production by QuoteWizard and to produce any further records.

Counsel for the parties have agreed to a 60-day extension to allow Plaintiff time to assess the additional production of records by QuoteWizard, for the production of further Drips records, and for QuoteWizard to then assess the production of additional records, if any, by Drips. The Parties agree and propose that at the end of this additional 60-day period, the Parties will submit a further joint status report to include proposed dates for the remainder of discovery, to be followed by expert disclosures and rebuttal reports, expert discovery and class certification motion briefing.

Dated: December 26, 2022

Respectfully submitted,
Joseph Mantha,
by his attorneys,

/s/ Edward A. Broderick

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Respectfully submitted,
QuoteWizard.com, LLC,
By its attorneys,

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CERTIFICATE OF SERVICE

I, Edward A. Broderick, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Dated: December 26, 2022

/s/ Edward A. Broderick